

EXHIBIT A

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 California Shellfish Company, Inc. and
 Robert Bugatto Enterprises*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

BRAND LITTLE, and ROBIN BURNS,
 Individually and on Behalf of All Others
 Similarly Situated,

Plaintiff,

v.

PACIFIC SEAFOOD PROCUREMENT,
 LLC; PACIFIC SEAFOOD PROCESSING,
 LLC; PACIFIC SEAFOOD FLEET, LLC;
 PACIFIC SEAFOOD DISTRIBUTION,
 LLC; PACIFIC SEAFOOD USA, LLC;
 DULCICH, INC.; PACIFIC SEAFOOD
 EUREKA, LLC; PACIFIC SEAFOOD
 CHARLESTON, LLC; PACIFIC SEAFOOD
 – WARRENTON, LLC; PACIFIC
 SEAFOOD – NEWPORT, LLC; PACIFIC
 SEAFOOD – BROOKINGS, LLC; PACIFIC
 SEAFOOD – WESTPORT, LLC; PACIFIC
 SURIMI – NEWPORT, LLC; BLUE RIVER
 SEAFOOD, INC.; SAFE COAST
 SEAFOODS, LLC; SAFE COAST
 SEAFOODS WASHINGTON, LLC;
 OCEAN GOLD SEAFOODS, INC.; NOR-

Case No.: 3:23-cv-01098-AGT

**INITIAL DISCLOSURES OF
 DEFENDANT CALIFORNIA
 SHELLFISH, INC.**

[Fed. R. Civ. Proc. Rule 26(a)(1)]

Judge: The Honorable Alex G. Tse

CAL SEAFOOD, INC.; AMERICAN
SEAFOOD EXP, INC.; CALIFORNIA
SHELLFISH COMPANY, INC.; ROBERT
BUGATTO ENTERPRISES, INC.;
ALASKA ICE SEAFOODS, INC.; LONG
FISHERIES, INC.; CAITO FISHERIES,
INC.; CATIO FISHERIES, LLC;
SOUTHWIND FOODS, LLC;
FISHERMEN’S CATCH, INC.; GLOBAL
QUALITY FOODS, INC.; GLOBAL
QUALITY SEAFOOD LLC; OCEAN KING
FISH, INC.; SOUTH BEND PRODUCTS
LLC; SWANES SEAFOOD HOLDING
COMPANY LLC; BORNSTEIN
SEAFOODS, INC.; ASTORIA PACIFIC
SEAFOODS, LLC; and DOES 29-60,

Defendants.

weintraub tobin chediak coleman grodin
law corporation

1 Defendant California Shellfish, Inc. ("CA Shellfish" or "Responding Party") pursuant to
2 F.R.C.P. 26(a)(1), submits its initial disclosures as follows:

3 **PRELIMINARY STATEMENT**

4 These initial disclosures are based on information reasonably available to CA Shellfish at
5 this time. CA Shellfish reserves the right to supplement or modify these disclosures as discovery
6 progresses pursuant to Fed. R. Civ. P. Rule 26(e)(1). CA Shellfish's disclosures are made without
7 in any way waiving: (1) the right to object on the grounds of competency, privilege, relevancy,
8 materiality, hearsay, or any other proper ground, to the use of any such information, for any
9 purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and
10 (2) the right to object on any and all grounds, at any time, to any other discovery request or
11 proceeding involving or relating to the subject matter of these responses. All of the disclosures set
12 forth below are made subject to the above objections and qualifications.

13 By making these disclosures, CA Shellfish does not: (1) represent that it has identified
14 every document, tangible thing, or witness possibly relevant to this lawsuit; (2) represent that
15 disclosed individuals necessarily have current knowledge of the identified areas of information; (3)
16 agree to permit counsel for any party to communicate with any of the identified individuals who
17 are employed by or are representatives of CA Shellfish; (4) waive its rights to object to the
18 production of any document, electronically stored information, tangible thing, or any other
19 information on the basis of any privilege, the work product doctrine, relevance, undue burden, or
20 any other valid objections; or (5) concede that Plaintiffs are entitled to any of the documents,
21 electronically stored information, or tangible things or to obtain testimony from any of the
22 individuals referenced herein.

23 CA Shellfish is continuing to investigate to identify knowledgeable persons with specificity
24 and will update these disclosures as appropriate and as needed. Further, CA Shellfish's
25 investigation is ongoing, and accordingly CA Shellfish reserves the right to supplement, amend, or
26 correct these disclosures and to rely on witnesses and documents not described herein if additional
27 information becomes available.

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1 Subject to these reservations, CA Shellfish discloses the following information:

2 **I. LIST OF PERSONS (F.R.C.P. 26(a)(1)(i))**

3 The following list identifies those individuals presently known to CA Shellfish who are
4 likely to have discoverable information that CA Shellfish may use in support of its claims and
5 defenses. Such identified individuals may be contacted through counsel. The following should not
6 be construed as an admission that the listed individuals will have discoverable information:

7 Eugene Bugatto: Mr. Bugatto may have information regarding the purchase of crab ex
8 vessel from crabbers, the sale of crab to retail and wholesale customers, and the price paid to
9 crabbers for crab and the price of crab sold by CA Shellfish.

10 Paul Eller: Mr. Eller may have information regarding CA Shellfish's costs, including costs
11 for purchasing, processing, storing, and transporting Dungeness crab, revenue received from the
12 sale of Dungeness crab, and reports made to state agencies regarding the purchases of Dungeness
13 crab.

14 Scott Adams: Mr. Adams may have information regarding the purchase of crab ex vessel
15 from crabbers, the sale of crab to retail and wholesale customers, the communications with crabbers
16 and customers, and the price paid to crabbers for crab and the price of crab sold by CA Shellfish.

17 Crystal Adams: Ms. Adams may have information regarding the purchase of crab ex vessel
18 from crabbers, the sale of crab to retail and wholesale customers, the communications with crabbers
19 and customers, and the price paid to crabbers for crab and the price of crab sold by California
20 Shellfish. Ms. Adams is no longer an employee of CA Shellfish, but may be contacted through the
21 undersigned counsel.

22 Discovery in this matter has only just begun. CA Shellfish believes that additional potential
23 witnesses may be identified through discovery. Moreover, Plaintiffs Brand Little and Robin Burns
24 also likely have discoverable information. CA Shellfish may also rely upon individuals identified
25 by other defendants in their disclosures, and includes them here by reference. CA Shellfish
26 reserves the right to identify additional persons if, during the course of investigation and discovery,
27 CA Shellfish learns that such persons have relevant knowledge.

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II. LIST OF DOCUMENTS [F.R.C.P. 26(a)(1)(ii)]

CA Shellfish will produce documents, data compilations, and/or tangible items that are in the possession, custody, or control of CA Shellfish, and that CA Shellfish may use to support its claims or defenses.

Certain of these documents, data compilations, and tangible things may contain or embody proprietary technical, financial, and customer information about CA Shellfish or third-parties and will be made available only under the terms of the protective order in this case. CA Shellfish reserves the right to supplement its document productions.

Based on the information reasonably available at this time, CA Shellfish believes that it may use at least the following categories of documents, data compilations, and tangible things to support its claims or defenses, unless solely for impeachment:

1. documents related to CA Shellfish's ex vessel purchase of Dungeness crab, including but not limited to dock tickets, receipts, and reports made to state agencies.
2. documents related to CA Shellfish's sales of Dungeness crab, including but not limited to orders, invoices, receipts.
3. documents related to the costs for purchasing, processing, storing, and transporting Dungeness crab, as well as revenue received from the sale of Dungeness crab.

III. DESCRIPTION & COMPUTATION OF DAMAGES [F.R.C.P. 26(a)(1)(iii)]

CA Shellfish has not asserted a claim for damages. This section is not applicable.

IV. INSURANCE AGREEMENTS [F.R.C.P. 26(a)(1)(iv)]

CA Shellfish is currently unaware of any insurance policy that would provide coverage for the claims at issue asserted in the Second Amended Complaint.

Dated: March 7, 2025

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law corporation

By: 

W. Scott Cameron

*Attorneys for Defendants
California Shellfish Company, Inc. and
Robert Bugatto Enterprises*

PROOF OF SERVICE

I, the undersigned, declare:

I am a citizen of the United States, employed in the City and County of Sacramento, California. My business address is 400 Capitol Mall, 11th Floor, Sacramento, California 95814 and my email address is aespanapurpur@weintraub.com. I am over the age of 18 years and not a party to the within action.

On the date below, I caused to be served the attached, and all exhibits thereto:

INITIAL DISCLOSURES OF DEFENDANT CALIFORNIA SHELLFISH, INC.

[X] (VIA EMAIL) I caused each such document to be sent by electronic mail to the addressees at the email addresses listed below.

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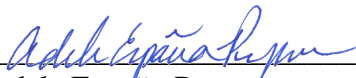
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I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. Executed at Sacramento, California, on March 7, 2025.


Adele España-Purpur